

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.

Plaintiff

v.

WORLD AVENUE USA, LLC
successor by merger to NIUTECH, LLC.,
DBA "THE USEFUL," ET AL.

Defendants

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Case No. PJM 08 cv 0921

MOTION FOR EXPEDITED RULING

Plaintiff requests an expedited ruling on its Motion to Strike at d. 143, and if that motion is denied, on Defendant World Avenue USA, LLC's Motion for Extension of Time to Comply with Joint Deadline for Reciprocal Exchange of Discovery and Electronically Stored Information Deposition and for Protective Order at d. 142, opposition at d.144. The main event at stake is a deposition of World Avenue USA, LLC in Miami, Florida set for the previously agreed date of January 14, 2010. Plaintiff respectfully requests a conference call for a telephonic hearing on these motions on January 12 or 13 if the Court's calendar will permit. Due to the shortness of time, defendant's counsel has not yet been consulted on the timing of this request.

/s/

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January 10, 2010

_____/s/
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Attorneys for Plaintiff

Certificate of Service

I certify that a copy of the foregoing documents was served on the date of ECF filing, via the ECF system, on all counsel of record.

_____/s/
Stephen H. Ring